

1 Todd E. Kennedy, Esq.  
2 Nevada Bar No. 6014  
3 **KENNEDY & COUVILLIER, PLLC**  
4 3271 E. Warm Springs Rd.  
5 Las Vegas, NV 89120  
Tel: (702) 605-3440  
Fax: (702) 625-6367  
tkennedy@kclawnv.com

6 **THE UNITED STATES DISTRICT COURT**  
7 **FOR THE DISTRICT OF NEVADA**

8 ALEXANDRIA HILL,

Case No. 2:18-cv-01117

9 Plaintiff,

10 v.

11  
12 SANTANDER CONSUMER USA INC.; DOE  
13 Individuals 1-10; DOE Employees 11-2- and  
ROE Corporations 21-30,

14  
15 **PLAINTIFF AND DEFENDANT  
SANTANDER CONSUMER USA INC.'S  
JOINT STIPULATION FOR EXTENSION  
OF TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

Defendants.

16 Plaintiff Alexandria Hill ("Plaintiff") and Defendant Santander Consumer USA Inc. (SC)  
17 (collectively, the "Parties"), by and through their respective undersigned counsel, hereby jointly  
18 stipulate for an extension of time for SC to respond to Plaintiff's Complaint. In support of this  
19 stipulation, the parties states as follows:

20 1. Plaintiff filed the Complaint on June 26, 2018. (ECF No. 1.) SC was served  
21 with a copy of the Summons and Complaint on or about June 29, 2018. SC's responsive pleading  
22 is due on or before July 19, 2018.

23 2. SC is investigating the allegations and requires additional time within which to  
24 conduct its investigation and respond to the Complaint.

1           3. The Parties hereby stipulate to a thirty (30) day extension of time for SC to  
2 respond to the Complaint, extending SC's response date until August 20, 2018.

3           4. This is the first stipulation for extension of time for SC to respond to the  
4 Complaint.

5           5. This motion is not made for the purpose of delay, and it will not prejudice the  
6 parties. The relief requested will not affect any other litigation deadlines in this case.

8           WHEREFORE, for the foregoing reasons and authorities, BANA respectfully requests  
9 that the Court grant this motion and extend BANA's deadline to respond to Plaintiff's Complaint  
10 in this case until April 16, 2018.

11           Dated: July 17, 2018.

12           COGBURN LAW OFFICES

13           By: /s/ Erik W. Fox  
14           JAIME S. COGBURN  
15           Nevada Bar No. 8409  
16           ERIK W. FOX  
17           Nevada Bar No. 8804  
18           2580 St. Rose Parkway  
19           Henderson, Nevada 89074  
Telephone: 702.748.7777  
Facsimile: 702.966.3880  
jsc@cogburnlaw.com  
efox@cogburnlaw.com

20           Attorneys for Plaintiff Alexandra  
21           Hill

KENNEDY & COUVILLIER

By: /s/ Todd E. Kennedy  
TODD E. KENNEDY  
Nevada Bar No. 6014  
3271 E. Warm Springs Rd.  
Las Vegas, Nevada 89120  
Telephone: 702.605.3440  
Facsimile: 702.625.6367  
tkennedy@kclawnv.com

22           Attorneys for Defendant Santander  
23           Consumer USA Inc.

24           IT IS SO ORDERED.

25             
UNITED STATES MAGISTRATE JUDGE

26           DATED: 7/19/2018